

UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS

CIVIL ACTION NO. 05-11803-MLW

SHENIA DANCY-STEWART as  
Administratrix of the Estate  
of EVELINE BARROS-CEPEDA,  
MARIA DaROSA, and LUIS  
CARVALHO,  
Plaintiffs,

v.

THOMAS TAYLOR, Jr., and the  
CITY OF BOSTON,  
Defendants.

**DEFENDANT CITY OF BOSTON'S ASSENTED-TO MOTION  
TO ENLARGE TIME TO FILE RESPONSIVE PLEADINGS  
PURSUANT TO FED.R.CIV.P. 6(B).**

NOW COMES the Defendant, City of Boston, who respectfully moves this Honorable Court pursuant to Fed. R. Civ. P. 6(b) for an extension of time to file a responsive pleading. As grounds for this motion, the Defendant, City of Boston, states that:

1. The Plaintiffs have assented to the Defendant, City of Boston's, request for more time to file responsive pleadings (Rule 7.1 certification included below);
2. Undersigned counsel requires additional time to investigate the Complaint and draft responsive pleadings;
3. The Defendant, City of Boston, requests an extension until October 21, 2005, to file a responsive pleading to Plaintiffs' Complaint; and,

4. Allowing this motion will not prejudice any party to the action and permitting the Defendant, City of Boston, an extension to file a responsive pleading to Plaintiffs' Complaint will further the interests of justice.

WHEREFORE, the Defendant, City of Boston, respectfully requests that this Honorable Court allow its motion to extend time to file responsive pleadings, and set the date for filing of responsive pleadings on or before October 21, 2005.

Respectfully submitted,

DEFENDANT CITY OF BOSTON,

**CERTIFICATE OF SERVICE**

I hereby certify that on this day, a copy of this document was served upon counsel of record for the Plaintiffs via U.S. Mail to Law Office of Andrew Stockwell-Alpert, 11 Beacon Street, Suite 1210, Boston, MA 02108.

10/14/05 /s/ Helen Litsas  
Date

Merita A. Hopkins  
Corporation Counsel

By its attorneys:

/S/ Helen Litsas  
Kate Cook BBO# 650698  
Helen Litsas BBO#644848  
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(617) 635-4022 (Cook)  
(617) 635-4023 (Litsas)

**7.1 Certification**

Undersigned counsel certifies that on October 14, 2005, pursuant to LR, D. Mass. 7.1(a)(2), she spoke with Plaintiffs' counsel, Andrew Stockwell Esq., who assented to the Defendant City of Boston's request for more time to file responsive pleadings.

Date: 10/14/05

/s/ Helen G. Litsas  
Helen G. Litsas